

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) RASHONDA MCCLELLAN, Case No. 23-11197 Chapter 7
All Cases: Moving Creditor AMERIHOM MORTGAGE COMPANY, LLC, Date Case Filed 08/25/2023

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe)

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed

Chapter 7: ☐ No-Asset Report Filed on
☒ No-Asset Report not Filed, Date of Creditors Meeting 10/16/23

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of 10/04/23 \$ 94,450.05
Total of all other Liens against Collateral \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in all cases) \$ 80,000.00 per Debtor's Sched A/B
5. Default
 - a. ☒ Pre-Petition Default
Number of months 17 Amount \$ 12,108.14
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$ _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362 (d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362 (d)(1)
 - i. ☐ Bad Faith
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe)
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention filed
 - ☒ Retain

Date: 10/16/23

/s/ Timothy R. Yueill
Submitted By